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BEFORE THE ARKANSAS SECURITIES COMMISSIONER CASE NO. C-11-0216 ORDER NO. C-11-0216-11-OR01

ARMANSAS SECURITIES DEPT.

IN THE MATTER OF:

LIFESONG DEVELOPMENT GROUP, LLC D/B/A DEALORBUYDINAR.COM

RESPONDENT

CONSENT ORDER

This Consent Order is entered pursuant to the Arkansas Money Services Act ("Act"), codified at Ark. Code Ann. §§ 23-55-101 through 23-55-1005, the Arkansas Money Services Rules ("Rules"), and the Arkansas Administrative Procedures Act, codified at Ark. Code Ann. §§ 25-15-101 through 25-15-219, in accordance with an agreement by and between the Staff of the Arkansas Securities Department ("Staff") and the Respondent, Lifesong Development Group, LLC d/b/a DealorBuyDinar.com ("LSDG"), in full and final settlement of all claims that could be brought against LSDG by the Staff on the basis of the facts set forth herein.

By signing below, LSDG admits the jurisdiction of the Act and the Arkansas Securities Commissioner ("Commissioner"), waives its right to a formal hearing and appeal, admits the findings of facts made herein, consents to the entry of this Order, and agrees to abide by its terms.

FINDINGS OF FACT

- 1. LSDG is a corporation organized under the laws of Illinois, with its principal office located at 902 South Randall Road, Suite C337, St. Charles, Illinois 60174. LSDG is not licensed or approved under the Act in any capacity.
- 2. LSDG holds itself out to the public as a currency exchanger that provides services throughout the United States.
- 3. LSDG engaged in the business of currency exchange in Arkansas without a license or approval under the Act from on or about November 16, 2009, until October 18, 2010.

- 4. From on or about November 16, 2009, until October 18, 2010, LSDG exchanged approximately \$1,697.00 into Iraqi dinars in approximately five transactions for residents of the State of Arkansas.
- 5. LSDG has fully cooperated with the Staff during the Staff's investigation of this matter and has assured the Staff that it neither intends nor desires to transact business in the State of Arkansas in the future, and does not plan to apply for licensure pursuant to the Act. Furthermore, LSDG has assured the Staff that it has instituted significant internal controls in order to ensure that the above-detailed violations will not occur in the future.

CONCLUSIONS OF LAW

- 6. Pursuant to Ark. Code Ann. §§ 23-55-101 through 23-55-1005, the Commissioner has jurisdiction over LSDG and the subject matter of this proceeding.
- 7. Ark. Code Ann. § 23-55-804 permits the informal disposition of an allegation by consent order.
- 8. Ark. Code Ann. § 23-55-401 states that a person may not engage in the business of currency exchange or advertise, solicit, or hold itself out as providing currency exchange unless the person is licensed under this subchapter, is licensed for money transmission or an authorized delegate of a person licensed under the Act, or is approved to engage in money transmission or an authorized delegate of a person approved to engage in money transmission under Ark. Code Ann. § 23-55-203. As detailed in paragraphs two through four, the failure by LSDG to obtain a license or approval in Arkansas prior to engaging in the business of currency exchange or advertising, soliciting, or holding itself out as providing currency exchange in Arkansas constituted five violations of Ark. Code Ann. § 23-55-401.
- 9. Pursuant to Ark. Code Ann. § 23-55-805, the Commissioner has the authority to assess a civil penalty against a person that violates the Act in an amount not to exceed \$1,000 per day

for each day the violation is outstanding. The violations by LSDG support an assessment by the Commissioner of a civil penalty against LSDG pursuant to Ark. Code Ann. § 23-55-805.

ORDER

By agreement and with the consent of the Staff and the authorized representative of LSDG, it t of be er. of

Amber E. Crouch, Staff Attorney Arkansas Securities Department